

From: [Miederhoff, Eric](#)
To: [Keller, Kaitlin](#)
Subject: FW: Propoxur Pet Collars - Reformulation and Existing Collar Phase-out Timing
Date: Monday, April 28, 2014 8:50:29 AM

From: Miederhoff, Eric
Sent: Friday, May 31, 2013 2:02 PM
To: James McFadden
Cc: Jakob, Avivah; Parrott, Patricia; Perry, Tracy
Subject: RE: Propoxur Pet Collars - Reformulation and Existing Collar Phase-out Timing

Jim,

Thank you for the update. I will be out of the office June 3rd through June 14th. In my absence, Avivah Jakob will again be the point of contact for propoxur concerns.

Regards,

Eric Miederhoff

From: James McFadden [<mailto:jmcfadden@central.com>]
Sent: Friday, May 31, 2013 11:35 AM
To: Miederhoff, Eric
Cc: Jakob, Avivah; Parrott, Patricia; Perry, Tracy
Subject: RE: Propoxur Pet Collars - Reformulation and Existing Collar Phase-out Timing
Eric –

Just to keep you informed:

As I mentioned, both Maija and Steve have been out this week, but are expected back next week. In addition, our regular Development Team Meetings will occur next week. I expect we should be able to make a commitment by the end of next week, and I am (hereby) committing to get something to you by then.

Regards,

James McFadden, Ph.D.

Sr. Regulatory Project Manager

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From: Miederhoff, Eric [<mailto:Miederhoff.Eric@epa.gov>]
Sent: Tuesday, May 28, 2013 12:31 PM
To: James McFadden
Cc: Jakob, Avivah; Parrott, Patricia; Perry, Tracy
Subject: Propoxur Pet Collars - Reformulation and Existing Collar Phase-out Timing
Jim,

Thank you for speaking with me earlier this morning. Per our conversation, here are the specifics of the phase-out plan the Agency is offering Wellmark to reformulate its propoxur pet collar products.

- Within 3 months, Wellmark will provide CSFs and the design specifications of the reformulated pet collar products.
- Within 1 year, Wellmark will stop production of the existing collars, and provide the following data on the new formulations:
 - o Updated Product Chemistry Data
 - o Efficacy Data

- Companion Animal Study
- Transferable Residue Study

- Within 2 years, Wellmark will stop sale and distribution of the old collar designs.

Additionally, the Agency requires Wellmark submit interim progress reports at 90 day intervals to document the progress being made toward these milestones and to help EPA assess the potential risk from the reformulated products.

These conditions will be documented as voluntary changes to the terms and conditions of Wellmark's pet collar registrations, including a provision that the registrations be cancelled if the Agency does not consider these requirements met within the specified time periods.

Thank you,

Eric Miederhoff
Chemical Review Manager
U.S. Environmental Protection Agency
Office of Pesticide Programs
Pesticide Re-evaluation Division
Risk Management and Implementation Branch 3
(703) 347-8028

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